

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 7
	§	
LEGENDARY FIELD EXHIBITIONS, LLC;	§	CASE NO. 19-50900-CAG
	§	
AAF PLAYERS, LLC;	§	CASE NO. 19-50902-CAG
	§	
AAF PROPERTIES, LLC;	§	CASE NO. 19-50903-CAG
	§	
EBERSOL SPORTS MEDIA GROUP, INC.;	§	CASE NO. 19-50904-CAG
	§	
LFE 2, LLC;	§	CASE NO. 19-50905-CAG
	§	
WE ARE REALTIME, LLC	§	CASE NO. 19-50906-CAG
	§	
DEBTORS		(SUBSTANTIVE CONSOLIDATION OF ALL 6 CASES, INTO ONE CASE, LEGENDARY FIELD EXHIBITIONS, LLC, CASE NO. 19-50900-CAG) SUBSTANTIVELY ADMINISTERED UNDER CASE NO. 19-50900-CAG

**APPLICATION OF TRUSTEE TO EMPLOY ACCOUNTANT
AND REQUEST FOR RELIEF (WITH 21-DAY LANGUAGE)**

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.

IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

NOW COMES RANDOLPH N. OSHEROW, Chapter 7 Trustee ("Trustee") of the bankruptcy estate of **LEGENDARY FIELD EXHIBITIONS, LLC, ET AL**, and files his Application to Employ Accountant. The Trustee would show the Court the following:

A copy of the proposed Order attached as Exhibit "A".

1. On 4/17/19 the consolidated cases were filed as Chapter 7 Bankruptcies under Chapter 7 of the Bankruptcy Code. On 4/17/19, Randolph N. Osherow was appointed Chapter 7 Trustee of consolidated Debtor entities bankruptcy estates and continues to act in that capacity.

2. The Trustee wishes to employ Janet Rakowitz of WYSI WYG Consulting, 11024 Macaway, #2, Adkins, Texas 78101, as the authorized accountant for the Trustee, to prepare the forthcoming Form 1120 tax returns for this estate at a flat rate of \$1850.00 per return.

3. No other Accountants have been hired to assist in preparation of Form 1120 Corporate Tax Returns. Trustee has selected Janet Rakowitz of WYSI WYG Consulting, as the Trustee believes that such accountant is well qualified to represent the bankruptcy estate in this proceeding, and it is necessary for the Trustee to employ Janet Rakowitz of WYSI WYG Consulting for such professional services to prepare the Form 1120 tax returns, for the benefit of the estate.

4. To the best of the Trustee's knowledge, Janet Rakowitz of WYSI WYG Consulting has no connection with the Debtor, the creditors, or any other party in interest, their respective attorneys and accountants. A Verified Statement of Accountant of No Interest Adverse to Estate of Debtor and Disclosure Statement signed by Janet Rakowitz of WYSI WYG Consulting are attached hereto.

5. Trustee proposes to pay Janet Rakowitz of WYSI WYG Consulting a flat fee \$1850.00 per return, which compensation is not the subject of any agreement to share funds by Janet Rakowitz of WYSI WYG Consulting and any other entity, except as disclosed in the Disclosure Statement, and will be paid upon approval of this Application of Trustee to Employ Accountant and Request for Relief. The U.S. Trustee's office has reviewed this rate for preparation of the tax returns and will receive notice of the Application.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that he be authorized to employ Janet Rakowitz of WYSI WYG Consulting as accountant to prepare the Form 1120 tax returns, at a flat rate of \$1850.00 per return and that an Order be entered.

Respectfully submitted this _____ day of April, 2022.

/s/ Randolph N. Osherow

RANDOLPH N. OSHEROW, Chapter 7 Trustee

Texas State Bar No. 15335500

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(210) 737-6312 - Telefax

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

**LEGENDARY FIELD EXHIBITIONS,
LLC;**

AAF PLAYERS, LLC;

AAF PROPERTIES, LLC;

**EBERSOL SPORTS MEDIA GROUP,
INC.;**

LFE 2, LLC;

WE ARE REALTIME, LLC

DEBTORS

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§ **CASE NO. 19-50900-CAG**
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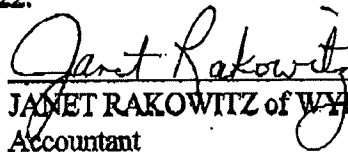
**(SUBSTANTIVE CONSOLIDATION OF
ALL 6 CASES, INTO ONE CASE,
LEGENDARY FIELD EXHIBITIONS,
LLC, CASE NO. 19-50900-CAG)
SUBSTANTIVELY ADMINISTERED
UNDER CASE NO. 19-50900-CAG**

**VERIFIED STATEMENT OF ACCOUNTANT
OF NO INTEREST ADVERSE TO ESTATE OF DEBTOR**

I, Janet Rakowitz of WYSI WYG Consulting, hereby state that I have no connection with the Debtor, creditors, or any other party in interest, their respective attorneys and accountants, and I do not hold or represent any interest adverse to the bankruptcy estate, and am a disinterested person within the meaning of 11 U.S.C. § 327(a) of the Bankruptcy Code.

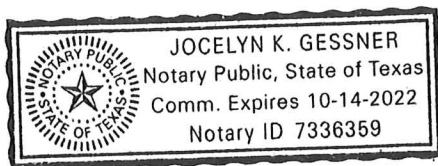
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 6th day of April, 2022.



JANET RAKOWITZ of WYSI-WYG Consulting
Accountant
11024 Macaway, #2, Adkins, Texas 78101

SWORN TO AND SUBSCRIBED before, by _____
by Janet Rakowitz of WYSI WYG Consulting, who states that the above is true and correct, to the
best of her knowledge on this 6th day of April, 2022.



Joelynn K. Gessner
NOTARY PUBLIC,
COUNTY OF BEXAR
STATE OF TEXAS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

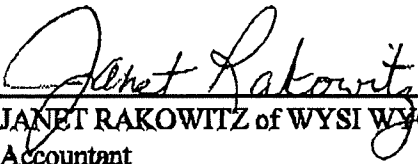
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**DISCLOSURE OF COMPENSATION
UNDER 11 U.S.C. 330 AND BANKRUPTCY RULE 2016(b)**

I certify that I am the applicant for the position of Accountant for the Chapter 7 Trustee, Randolph N. Osherow, in the above-styled and referenced cause. No compensation has been paid to me in connection with the above-referenced case under Title 11 of the United States Code. Application is made herein for a flat rate of \$1850.00 per return. The source of the compensation agreed to be paid is from the bankruptcy estate payable upon further order of this Court.

I have not agreed to share this compensation with any other person.

Dated this 6th day of April, 2022.


JANET RAKOWITZ of WYSI WYG Consulting
Accountant
11024 Macaway, #2, Adkins, Texas 78101

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

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§ CHAPTER 7

**LEGENDARY FIELD EXHIBITIONS,
LLC;**

2

§ CASE NO. 19-50900-CAG

AAF PLAYERS, LLC;

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§
§ **CASE NO. 19-50902-CAG**

AAF PROPERTIES, LLC;

22

§ CASE NO. 19-50903-CAG

**EBERSOL SPORTS MEDIA GROUP,
INC.;**

§

§ CASE NO. 19-50904-CAG

LFE 2, LLC;

22

§ CASE NO. 19-50905-CAG

WE ARE REALTIME, LLC

§

§ CASE NO. 19-50906-CAG

ss

DEBTORS

**(SUBSTANTIVE CONSOLIDATION OF
ALL 6 CASES, INTO ONE CASE,
LEGENDARY FIELD EXHIBITIONS,
LLC, CASE NO. 19-50900-CAG)
SUBSTANTIVELY ADMINISTERED
UNDER CASE NO. 19-50900-CAG**

ORDER AUTHORIZING EMPLOYMENT OF ACCOUNTANT FOR TRUSTEE

On the day this Order was signed, came for consideration the Application of Trustee to Employ Accountant and Request for Relief. It appearing that such application is proper and should be granted, it is therefore

EXHIBIT "A"

ORDERED that the employment of Janet Rakowitz of WYSI WYG Consulting, 11024 Macaway, #2, Adkins, Texas 78101, as accountant for the estate is hereby authorized and approved at a flat rate of \$1850.00 per Form 1120 tax returns, without further Order of this Court.

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CERTIFICATE OF MAILING

I certify that copies of the APPLICATION OF TRUSTEE TO EMPLOY ACCOUNTANT AND REQUEST FOR RELIEF (21) day language-were mailed to the below named persons, by first class mail, on this the 6 day of April, 2022:

Legendary Field Ex. LLC 4525 Macro San Antonio, TX 78218	U.S. Trustee PO Box 1539 San Antonio, TX 78295
William A. (Trey) Wood, III Bracewell LLP 711 Louisiana Suite 2300 Houston, TX 77002 Counsel for Debtor(s)	Janet Rakowitz WYSI WYG Consulting 11024 Macaway, #2 Adkins, Texas 78101

SEE THE ATTACHED MATRIX FOR A LIST OF PARTIES NOTICED.

/s/ Randolph N. Osherow

RANDOLPH N. OSHEROW, Chapter 7 Trustee

State Bar No. 15335500

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